

**EXHIBIT**  
**F**

**From:** [Jorge Alvarez](#)  
**To:** [Sky Willard](#); [Brianna Somohano](#)  
**Cc:** [RAÚL SEDILLO](#); [Chandice Saavedra](#); [Marina Pavlakos](#)  
**Subject:** Re: Motion for leave to Amend and Amended Complaint  
**Date:** Tuesday, August 13, 2024 2:22:30 PM  
**Attachments:** [image003.png](#)  
[image005.png](#)  
[image006.png](#)  
[image001.png](#)  
[Outlook-pgnnrefb.png](#)

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Good afternoon Sky,

We will produce them today. For some reason, we calendared them for today.



Jorge L. Alvarez, Esq.  
Attorney

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(210)496-0060 | Fax  
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[www.jfdlawfirm.com](http://www.jfdlawfirm.com)

**We have moved! Please note our new address above.**

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**From:** Sky Willard <[SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM)>  
**Sent:** Tuesday, August 13, 2024 2:57 PM  
**To:** Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>; Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>  
**Cc:** RAÚL SEDILLO <[RSedillo@JSHFIRM.COM](mailto:RSedillo@JSHFIRM.COM)>; Chandice Saavedra <[CSaavedra@JSHFIRM.COM](mailto:CSaavedra@JSHFIRM.COM)>;  
Marina Pavlakos <[MPavlakos@JSHFIRM.COM](mailto:MPavlakos@JSHFIRM.COM)>  
**Subject:** RE: Motion for leave to Amend and Amended Complaint

Good afternoon Jorge,

Initial disclosures were due yesterday. When can we expect Plaintiff's by?

Thanks,



**SKY WILLARD** | Attorney

Jones, Skelton & Hochuli, P.L.C.

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**From:** Sky Willard

**Sent:** Monday, August 12, 2024 1:10 PM

**To:** Jorge Alvarez <jorge@jfdlawfirm.com>; Brianna Somohano <brianna@jfdlawfirm.com>

**Cc:** RAÚL SEDILLO <RSedillo@JSHFIRM.COM>; Chandice Saavedra <CSaavedra@JSHFIRM.COM>; Marina Pavlakos <MPavlakos@JSHFIRM.COM>

**Subject:** RE: Motion for leave to Amend and Amended Complaint

Thanks Jorge,

I apologize—I got the date this is due wrong. Pursuant to the Court’s Initial Scheduling Order [Doc. 15], Plaintiff must file no later than August 13, 2024. Please see the attached revised draft. I only made format changes to your version and signed off on the bottom. Please let me know if you need anything else with this before filing tomorrow.

Thanks,



**SKY WILLARD** | Attorney

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**From:** Jorge Alvarez <jorge@jfdlawfirm.com>

**Sent:** Monday, August 12, 2024 11:22 AM

**To:** Sky Willard <SWillard@JSHFIRM.COM>; Brianna Somohano <brianna@jfdlawfirm.com>

**Subject:** Re: Motion for leave to Amend and Amended Complaint

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Sky,

Please see attached hereto my proposed revisions. I don’t think we would take depositions that last more than four hours, but I changed the number to 5 hours just in case. Also, I extended the discovery periods to avoid having to come back to the court to ask for extensions since we added

new parties when we filed the amended complaint.

Please let me know if you agree with the proposed revisions, if not, we can each submit our own version.

Thanks for putting this together.

Jorge L. Alvarez  
Attorney



DeSouza Injury Lawyers  
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Office: 210-714-4215  
Fax: 210-496-0060  
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E-Mail: [jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)

[www.jfdlawfirm.com](http://www.jfdlawfirm.com)

---

**From:** Sky Willard <[SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM)>

**Date:** Monday, August 12, 2024 at 8:35 AM

**To:** Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>, Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>, Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>

**Cc:** RAÚL SEDILLO <[RSedillo@JSHFIRM.COM](mailto:RSedillo@JSHFIRM.COM)>, Chandice Saavedra <[CSaavedra@JSHFIRM.COM](mailto:CSaavedra@JSHFIRM.COM)>, Marina Pavlakos <[MPavlakos@JSHFIRM.COM](mailto:MPavlakos@JSHFIRM.COM)>

**Subject:** RE: Motion for leave to Amend and Amended Complaint

Good morning Jorge,

I am following up on the draft JSR. It is due today.

Thanks,

**SKY WILLARD** | Attorney



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---

**From:** Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>  
**Sent:** Tuesday, August 6, 2024 10:08 AM  
**To:** Sky Willard <[SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM)>; Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>; Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>  
**Cc:** RAÚL SEDILLO <[RSedillo@JSHFIRM.COM](mailto:RSedillo@JSHFIRM.COM)>; Chandice Saavedra <[CSaavedra@JSHFIRM.COM](mailto:CSaavedra@JSHFIRM.COM)>; Marina Pavlakos <[MPavlakos@JSHFIRM.COM](mailto:MPavlakos@JSHFIRM.COM)>  
**Subject:** Re: Motion for leave to Amend and Amended Complaint

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Sky,

Thanks for getting back to me. I incorrectly referred to a local rule here in Texas. I don't believe there is a formal rule that addresses amending captions but typically amending the caption of case requires a motion to amend caption to be filed.

I will mark you as unopposed to our motion for leave to amend. I will review the joint status report and get back to you on a separate email.

Jorge L. Alvarez  
Attorney



DeSouza Injury Lawyers  
4047 Naco Perrin Suite 100  
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E-Mail: [jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)

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---

**From:** Spencer L. Edelman <[sle@modrall.com](mailto:sle@modrall.com)>

**Date:** Tuesday, August 6, 2024 at 10:44 AM

**To:** Sky Willard <[SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM)>, Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>, Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>, Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>

**Cc:** Taryn F. Hanrahan <[taryn.hanrahan@modrall.com](mailto:taryn.hanrahan@modrall.com)>, RAÚL SEDILLO <[RSedillo@JSHFIRM.COM](mailto:RSedillo@JSHFIRM.COM)>, Chandice Saavedra <[CSaavedra@JSHFIRM.COM](mailto:CSaavedra@JSHFIRM.COM)>, Marina Pavlakos <[MPavlakos@JSHFIRM.COM](mailto:MPavlakos@JSHFIRM.COM)>

**Subject:** RE: Motion for leave to Amend and Amended Complaint

Thanks Sky. I think that with the dismissal (and the Court's termination), it is best not to note us on the signature block in any way (we don't want to accidentally get readed), but I have no problem with you noting that I participated but defer to your preference.



Spencer L. Edelman

[spencer.edelman@modrall.com](mailto:spencer.edelman@modrall.com)

---

**From:** Sky Willard <[SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM)>

**Sent:** Monday, August 5, 2024 6:09 PM

**To:** Spencer L. Edelman <[sle@modrall.com](mailto:sle@modrall.com)>; Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>; Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>; Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>

**Cc:** Taryn F. Hanrahan <[taryn.hanrahan@modrall.com](mailto:taryn.hanrahan@modrall.com)>; RAÚL SEDILLO <[RSedillo@JSHFIRM.COM](mailto:RSedillo@JSHFIRM.COM)>; Chandice Saavedra <[CSaavedra@JSHFIRM.COM](mailto:CSaavedra@JSHFIRM.COM)>; Marina Pavlakos <[MPavlakos@JSHFIRM.COM](mailto:MPavlakos@JSHFIRM.COM)>

**Subject:** RE: Motion for leave to Amend and Amended Complaint

Counsel,

This email provides a draft of the Joint Status Report and Defendant Jorge Zuniga Isais d/b/a RVJ Transport's position on Plaintiff's Motion for Leave to Amend.

Attached, please see the draft Joint Status Report and Provisional Discovery Plan. Given Spencer's client's dismissal, I believe we may proceed without Spencer, but nevertheless wanted to keep him in the loop for the time being. Jorge, please use track changes to mark any alterations and additions.

As for Plaintiff's Motion for Leave to Amend, we do not have any opposition, however I am unable to find the local rule regarding the case caption, Jorge could you please direct me to which rule you are referencing? I have seen case captions altered subsequent to adding or removing parties in Federal Court, however this might be addressed in the Court's future Order.

Thank you,



**SKY WILLARD** | Attorney

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**From:** Spencer L. Edelman <[sle@modrall.com](mailto:sle@modrall.com)>

**Sent:** Monday, August 5, 2024 3:49 PM

**To:** Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>; Sky Willard <[SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM)>; Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>; Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>

**Cc:** Taryn F. Hanrahan <[taryn.hanrahan@modrall.com](mailto:taryn.hanrahan@modrall.com)>

**Subject:** RE: Motion for leave to Amend and Amended Complaint

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We've just submitted the stipulation of dismissal as to Bar-S Foods. I think that eliminates the need for our client's consent to the filing of the amended complaint, but if you need it, you can note our consent.



Spencer L. Edelman

[spencer.edelman@modrall.com](mailto:spencer.edelman@modrall.com)

---

**From:** Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>

**Sent:** Monday, August 5, 2024 2:59 PM

**To:** Spencer L. Edelman <[sle@modrall.com](mailto:sle@modrall.com)>; [SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM); Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>; Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>

**Subject:** FW: Motion for leave to Amend and Amended Complaint

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**Please disregard the email below my previous email, which was intended for our paralegal, Brianna.**

**From:** Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>

**Date:** Monday, August 5, 2024 at 3:57 PM

**To:** [SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM) <[SWillard@JSHFIRM.COM](mailto:SWillard@JSHFIRM.COM)>, Spencer L. Edelman <[sle@modrall.com](mailto:sle@modrall.com)>, Taryn F. Hanrahan <[taryn.hanrahan@modrall.com](mailto:taryn.hanrahan@modrall.com)>, Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>

**Subject:** RE: Motion for leave to Amend and Amended Complaint

Counsel,

Please see attached our motion for leave to amend. Please let me know if you will oppose our motion.

We are getting ready to dismiss without prejudice Bar-S-Foods. However, it is my understanding of the local rules that the caption of the case remains the same irrespective of whether we drop or add parties.

Jorge L. Alvarez  
Attorney



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San Antonio, Texas 78217  
Office: 210-714-4215  
Fax: 210-496-0060  
Cell: 210-287-8518  
E-Mail: [jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)

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---

**From:** Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>

**Date:** Monday, August 5, 2024 at 3:36 PM

**To:** Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>

**Cc:** Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>, Vanessa Tagre <[Vanessa@jfdlawfirm.com](mailto:Vanessa@jfdlawfirm.com)>, Rosy Anderson <[rosy@jfdlawfirm.com](mailto:rosy@jfdlawfirm.com)>

**Subject:** Re: RE: Motion for leave to Amend and Amended Complaint

Jorge,

Please see the attached.

Thank you,  
Brianna

---

**From:** Jorge Alvarez <[jorge@jfdlawfirm.com](mailto:jorge@jfdlawfirm.com)>

**Sent:** Friday, August 2, 2024 5:55 PM

**To:** Brianna Somohano <[brianna@jfdlawfirm.com](mailto:brianna@jfdlawfirm.com)>; Frank Pehlke <[frank@jfdlawfirm.com](mailto:frank@jfdlawfirm.com)>

**Cc:** Rosy Anderson <[rosy@jfdlawfirm.com](mailto:rosy@jfdlawfirm.com)>

**Subject:** RE: Motion for leave to Amend and Amended Complaint

Brianna,

Please finalize the motion to include relevant dates and certificate of conference. Please finalize the amended complaint and fix formatting errors. Please let me know when you are done so that I can send it to opposing counsel.

Thanks,



Jorge L. Alvarez  
Attorney

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